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 Attorney for Debtors

UNITED STATES BANKRUPTCY COURT
 FOR THE DISTRICT OF NEVADA

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IN RE:

Case No. 21-14978-abl
 (Chapter 11)

SILVER STATE BROADCASTING,
 LLC,

Jointly Administered with:

Debtor.

21-14979-abl	Golden State Broadcasting, LLC
21-14980-abl	Major Market Radio LLC

☐ AFFECTS THIS DEBTOR

☐ AFFECTS GOLDEN STATE
 BROADCASTING, LLC

☐ AFFECTS MAJOR MARKET RADIO LLC

☒ AFFECTS ALL DEBTORS

**DECLARATION OF EDWARD R. STOLZ
 IN SUPPORT OF JOINTLY
 ADMINISTERED DEBTORS' FIRST
 MOTION TO EXTEND EXCLUSIVITY
 PERIODS UNDER 11 U.S.C. § 1121(D)(1)**

Hearing Date: March 16, 2022

Hearing Time: 1:30 p.m.

EDWARD R. STOLZ, under penalty of perjury, declares and states as follows:

1. I am over the age of 18 years, am mentally competent and have personal knowledge of the matters set forth in this Declaration. If called upon as a witness, I could and would competently testify to these matters.

2. I am the manager and sole shareholder of Royce International Broadcasting Corp., sole member of Silver State Broadcasting, LLC, Golden State Broadcasting, LLC, and Major Market LLC, all Nevada limited liability companies which own certain FCC radio station licenses identified under call signs KFRH, KREV, KRCK-FM, KBET(AM) and several FM translator

1 stations (collectively the "Radio Stations"). I have owned and operated radio stations in California
2 and Nevada for over 40 years. I am not just an owner; I am also a broadcast engineer who has
3 constructed many broadcasting stations, from the ground up. In addition to designing, installing,
4 calibrating, operating, and maintaining broadcast equipment over the years, I have built each of
5 the FM stations (KFRH, KREV and KRCK and the translators) essentially from the ground up.

6 3. I have read the Debtors' REPLY TO OBJECTION TO JOINTLY
7 ADMINISTERED DEBTORS' FIRST MOTION TO EXTEND EXCLUSIVITY PERIODS
8 UNDER 11 U.S.C § 1121(D)(1) ("Reply") and attest that the facts stated therein are true and
9 correct to the best of my knowledge and belief.

10 4. Long before W. Lawrence Patrick was appointed as Receiver over the Debtor's
11 FM Stations, he convinced me to hire him to market FM station KREV in the San Francisco
12 market for sale. He and his associate obtained extensive information about the Station in the
13 course of that engagement, but they never presented a serious offer for the station. Instead, he
14 switched sides and convinced the plaintiffs in the California District Court litigation to have him
15 appointed as Receiver for the Debtors' stations.

16 5. More recently, in my attempts to retake control of the Debtors' Radio Station
17 assets from the Receiver, I have found some of the physical assets have been vandalized, parted
18 out, and burned/ charred, with wiring severed, and equipment torn out of housings and strewn
19 about the transmitter room. I also located some assets across state lines at different locations even
20 though the Receiver never gave notice to me or the Debtors that he was moving those assets.

21 6. The Receiver dismantled the Debtors' Radio Stations operations as they existed
22 before his appointment, and he has refused to return the assets in the condition in which they were
23 when he took control. Thus, I have worked diligently to try to rebuild the Radio Stations. I have
24 restored the Palm Springs station and it is currently back on the air with news/talk programming.
25 The Radio Stations' prior regular music programming requires new programming personnel and
26 agreements which the Receiver cancelled when he took control of the Radio Stations. Thus, I am
27 working on restoring those relationships and agreements.


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7. I am also diligently working on reconstructing the Las Vegas station and expect to have that station back on the air in approximately twenty days. During the Receiver's tenure, the San Francisco station lost its studio facility, its communication links, and its regular programming. Thus, after I get the Las Vegas station back on air, I will focus on restoring San Francisco's operations and expect to have that station back on the air in early April. It is almost unheard of in the industry to rebuild and have stations back on air this quickly considering the condition in which I have found everything.

8. I am prepared to use my own personal assets to rebuild and fund the Debtors' Radio Stations as necessary to maximize their value for the Debtors' proposed plan of reorganization. The Debtors will be able to fund their ultimate plan either through my contribution of new value, ongoing business revenues, partial liquidation of assets, or a combination of revenues and liquidation. The Radio Stations are located in top broadcasting markets, and with the right marketing, they have the ability to command significantly more value than what the Receiver has proposed.

9. The Debtors' request for a reasonable extension of their plan exclusivity periods is not intended to unduly delay these reorganizations. Instead, the Debtors require additional time simply because we are trying to get up to speed about the Debtors' assets and liabilities after the Receiver's control over the Radio Station operations.

DATED this 9th day of March 2022.


Edward R. Stolz